

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

OASIS TOOLING, INC.,

Plaintiff,

v.

GLOBALFOUNDRIES U.S. INC.,

Defendant.

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C.A. No. 22-312-CJB



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**DECLARATION OF MICHAEL J. FARNAN**

I, Michael Farnan, declare as follows:

1. I am attorney at the law firm of Farnan LLP. I submit this declaration in support of Defendant GlobalFoundries U.S. Inc.’s (“GF US”) Motion for Summary Judgment Regarding Damages, filed in the above captioned case. The statements made herein are based on my own knowledge and, if called upon to testify thereto, I could and would do so competently.

2. Attached as **Exhibit 1** is a true and correct copy of the declaration of Ashwini Sachdev in support of Defendant GF US’s Motion for Summary Judgment Regarding Damages.

3. Attached as **Exhibit 2** is a thumb drive with a true and correct copy of a native Excel spreadsheet produced at GF30000106.

4. Attached as **Exhibit 3** is a thumb drive with a true and correct copy of a native Excel spreadsheet produced at GF30000107.

5. Attached as **Exhibit 4** is a true and correct copy of excerpts from the deposition of James Pampinella, taken on December 14, 2023 in the above captioned case.

6. Attached as **Exhibit 5** is a true and correct copy of excerpts from the Rebuttal Expert Report of Paul K. Meyer, served October 13, 2023.

7. Attached as **Exhibit 6** is a true and correct copy of excerpts from the Rebuttal

Expert Report of Dr. Scott Thompson, served October 13, 2023.

8. Attached as **Exhibit 7** is a true and correct copy of excerpts from Plaintiff Oasis Tooling, Inc.'s Eighth Supplemental Objections and Responses to Defendant's First Set of Interrogatories (Nos. 4), served December 26, 2023.

9. Attached as **Exhibit 8** is a true and correct copy of excerpts from the deposition of Michael Valletta, taken on June 22, 2023 in the above captioned case.

10. Attached as **Exhibit 9** is a true and correct copy of excerpts from Defendant GlobalFoundries U.S. Inc.'s Supplemental Objections and Responses to Plaintiff's Second Set of Interrogatories (Nos. 5-11), served August 24, 2023.

11. Attached as **Exhibit 9** is a true and correct copy of excerpts from the Expert Report of James Pampinella, served August 25, 2023.

12. Attached as **Exhibit 10** is a true and correct copy of excerpts from the Supplemental Expert Report of Paul K. Meyer, served December 31, 2023.

13. Attached as **Exhibit 11** is a true and correct copy of excerpts from the Rebuttal Expert Report of Dr. Massoud Pedram, served October 13, 2023.

14. Attached as **Exhibit 12** is a true and correct copy of excerpts from the Reply Expert Report of James Pampinella, served November 21, 2023.

15. Attached as **Exhibit 13** is a true and correct copy of excerpts from the deposition of Ashwini Sachdev, taken on August 29, 2023 in the above captioned case.

I declare under penalty of perjury under the laws of the United States that each of the above statements is true and correct.

Dated: February 2, 2024

Respectfully submitted,

/s/ Michael J. Farnan  
Michael Farnan